

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No: 04-40190-FDS

COLLEEN O'DONNELL,	)
Plaintiff,	)
	)
v.	)
	)
ALBERTO R. GONZALES, ATTORNEY	)
GENERAL, U.S. DEPARTMENT	)
OF JUSTICE,	)
Defendant,	)

**PLAINTIFF'S MOTION TO EXTEND TIME TO FILE AN OPPOSITION TO  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND MEMORANDUM IN  
SUPPORT THEREOF BY ONE DAY**

Now comes the Plaintiff in the above-entitled matter and hereby requests this Honorable Court to allow the Plaintiff to file her Motion to Extend Time to File an Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support thereof, by one day, until April 18, 2006.

As reasons therefor, the Defendants' Motion for Summary Judgment and Memorandum in Support thereof are extremely lengthy and voluminous documents. The memorandum and Statement of Facts consist of sixty (60) pages together with sixty-nine (69) exhibits. Plaintiff's counsel has to extensively review all of the facts and documents in order to respond to same.

Over 6,000 documents have been produced through discovery in this case. Plaintiff's counsel must review an extensive amount of material in order to respond to Defendants' motion.

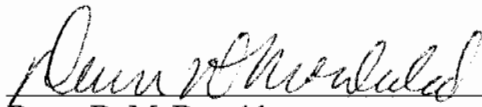
While Plaintiff's counsel is making every effort to complete her opposition to Defendant's motion by 5:00 p.m., today, she believes that one additional day will be necessary in order to complete all required documents and to prepare all exhibits for electronic filing.

WHEREFORE, Plaintiff's counsel requests this Honorable Court allow Plaintiff's Motion to Extend Time to File an Opposition to Defendants' Motion for Summary Judgment and Memorandum in Support Thereof, by one day, until April 18, 2006.

The Plaintiff  
Colleen O'Donnell

Dated: April 17, 2006

By her Attorney

  
Dawn D. McDonald  
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**CERTIFICATE OF SERVICE**

I, Dawn D. McDonald, hereby certify that I caused the foregoing to be served upon the Defendant by electronically filing a copy thereof on this 17<sup>th</sup> day of April, 2006, as follows:

Damian Wilmot, Esq.  
Assistant U.S. Attorney  
John Joseph Moakley Federal Court  
One Courthouse Way, Suite 9200  
Boston, MA 02210

  
Dawn D. McDonald

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